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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELIZABETH MARIE LAMBRIGHT,

Defendant.

Case No. 3:20-cr-00318-SI

**UNOPPOSED MOTION TO
CONTINUE TRIAL**

NOW COMES Elizabeth Marie Lambright, through her attorney, Gerald M. Needham, and moves to continue the presently scheduled trial date of March 23, 2021, to June 22, 2021, or a date thereafter convenient to the Court. This motion is unopposed by the government. March 23, 2021, is the third trial setting.

Ms. Lambright has been indicted for one count of Possession with Intent to Distribute Heroin in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A). The Indictment contains a forfeiture allegation.

Ms. Lambright has been released to an inpatient treatment program and is doing well. She has been advised of the need for a continuance and has authorized counsel to represent she consents

to the continuance with the knowledge that the timeframe is excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A).

Defense counsel is in need of additional time to continue pretrial investigation including, but not limited to, conducting further legal research, reviewing discovery materials with Ms. Lambright, continuing efforts to locate potential witnesses, determining what pretrial motions, if any, need be filed, and otherwise properly preparing for trial.

Assistant United States Attorney Ashley Cadotte has authorized counsel to represent the government has no objection to the requested continuance.

Based on the aforementioned, counsel moves to continue the trial of March 23, 2021, to June 22, 2021, or a date thereafter convenient to the Court. The timeframe of the requested continuance is excludable from Speedy Trial computations pursuant to 18 U.S.C. § 3161(h)(7)(A), as additional time is required for pretrial investigation and trial preparation and the ends of justice served by the granting of the continuance outweigh the interests of the public and the defendant in a speedier trial.

Respectfully submitted on March 15, 2021.

/s/ Gerald M. Needham

Gerald M. Needham

Assistant Federal Public Defender